

## **REMARKS/ARGUMENTS**

Claims 1-27 are pending in the application. Claims 1-27 are rejected under 35 U.S.C. 112; and claims 1-27 are rejected as obvious under 35 U.S.C. 103(a).

### ***Specification Amendment***

The foregoing amendment adds a claim of priority for the present application to co-pending U.S. Patent Application Serial No. 09/671,424 filed September 27, 2000, entitled “System and Method for Delivering Financial Services”, which is a continuation-in-part of U.S. Patent Application Serial No. 09/323,210 filed June 1, 1999, entitled “System and Method for Delivering Financial Services”, which is a continuation of U.S. Patent Application No. 08/908,413 filed August 7, 1997 (claiming priority to U.S. Provisional Application No. 60/029,209 filed October 31, 1996), entitled “System and Method for Delivering Financial Services”, now U.S. Patent No. 5,933,816 issued August 3, 1999, entitled “System and Method for Delivering Financial Services.”

### ***Claim Amendments***

Independent claim 1 is amended to add “identifying a type of user account”, and independent claim 27 is amended to add “means for identifying a type of user account”.

New independent claim 28 proposes a method for a user to obtain international account products access on a network, that involves providing a plurality of local terminals within each of a plurality of pre-defined business regions of a financial institution and at least one front-end processor as exclusive arbitrator of transaction acceptance and fulfillment for each of said plurality of local terminals within said business region, each of said local terminals sharing a common interface with the front-end processors for all of said business regions, and each of said front-end processors providing a set of user transactions that is common to each of said business regions, and allowing a user to access one of said local terminals within one of said business regions, identifying a type of user account by an application on the local terminal, and if a non-local user account type is identified, establishing a real-time

interactive session directly between the user at the local terminal and said at least one front-end processor for said business region via said common interface. See, e.g., Spec., p. 9, lines 8-12; p. 10, lines 12-25; p. 11, lines 1-p. 13, line 23.

In addition, new independent claim 28 proposes automatically presenting a list of language options at the local terminal by the front-end processor via said common interface, and receiving the user's selection of a language from the list of language options at the local terminal by the front-end processor via said common interface; automatically prompting the user for an access code in the selected language at the local terminal by the front-end processor via said common interface, receiving the user's input of the access code at the local terminal by the front-end processor via said common interface, and automatically verifying the access code by the front-end processor. See, e.g., Spec., p. 13, line 24-p. 15, line 16. Further, new independent claim 28 proposes automatically providing the user with a list consisting of the set of user transactions that is common to each of said business regions in the selected language at the local terminal by the front-end processor via said common interface, receiving the user's selection of a transaction from the list of transactions by the front-end processor via said common interface, and allowing the user at the local terminal to perform the selected transaction interactively in the selected language with the front-end processor via the common interface. See, e.g., Spec., p. 13, line 24-p. 15, line 16.

Support for the foregoing amendment is found throughout the specification and in the claims and as detailed above. Accordingly, no new matter has been added.

#### ***Claim Rejections - 35 U.S.C. § 112***

Claims 1-27 stand rejected under 35 U.S.C. § 112 because the Examiner considers that there is no antecedent reference for "a non-local user type" as recited in claims 1 and 27. While the rejection is not believed to be appropriate, the foregoing amendment of claims 1 and 27 adding "identifying a type of user account" to each of claims 1 and 27 overcomes the rejection.

***Claim Rejections - 35 U.S.C. § 103***

Claims 1-27 stand rejected under 35 U.S.C. § 103(a) as obvious over Zeanah (WO 98/19278). The rejection is respectfully traversed and reconsideration is requested. The forgoing amendment adds a claim of priority for this application to U.S. Patent Application No. 08/908,413 filed August 7, 1997 (claiming priority to U.S. Provisional Application No. 60/029,209 filed October 31, 1996), to which Zeanah (WO 98/19278) likewise claims priority. Consequently, Zeanah (WO 98/19278) asserted by the Examiner is not prior art at least in respect to claims 1-27 under either 35 U.S.C. §102 or 35 U.S.C. §103(a).

Regarding new independent claim 28, however, Zeanah (WO 98/19278) fails to teach or suggest, e.g., (a) a plurality of local terminals within each of a plurality of pre-defined business regions of a financial institution, (b) at least one front-end processor as exclusive arbitrator of transaction acceptance and fulfillment for each of the plurality of local terminals within the business region, (c) each of the local terminals sharing a common interface with the front-end processors for all of the business regions, and (d) each of the front-end processors providing a set of user transactions that is common to each of said business regions, as recited in new claim 28.

On the contrary, while Zeanah (WO 98/19278) discloses, e.g., a special NetCAT server 200 that is able to present "home screens" on local terminals for traveling customers, Zeanah (WO 98/19278) neither teaches nor suggests, e.g., at least one front-end processor as exclusive arbitrator of transaction acceptance and fulfillment for each of the plurality of local terminals within the business region, as recited in new claim 28. As pointed out by Applicants, significant advantages of having the regional front end processors as the arbitrators of each transaction acceptance and fulfillment instead of the local terminals are that it provides the maximum flexibility at each regional level for product and services offered and allows for regional variations in the present and future without requiring changes to the local terminal software. See, e.g., Spec. p. 9, lines 8-12.

Further, instead of, e.g., each of the local terminals sharing a common interface with the front-end processors for all of the business regions, and each of the front-end processors providing a set of user transactions that is common to each of said business regions, as recited in claim 28, Zeanah (WO 98/19278) requires at least one of the special NetCAT servers for each region running the particular region's ATM software in order for the local ATM software to connect the ATM to the appropriate regional special NetCAT server when a traveling customer dips his or her card at a local ATM. See, e.g., Zeanah (WO 98/19278), p. 43, line 18-p. 44, line 22.

Consequently, Zeanah does not disclose, nor even suggest, the required combination of limitations proposing a method for a user to obtain international account products access on a network, as recited in new independent claim 28. Because the cited reference does not teach the limitations of new independent claim 28, the Examiner has failed to establish the required *prima facie* case of unpatentability. See In re Royka, 490 F.2d 981, 985 (C.C.P.A., 1974) (holding that a *prima facie* case of obviousness requires the references to teach all of the limitations of the rejected claim); See also MPEP §2143.03.

## Conclusion

In view of the foregoing amendment and these remarks, each of the claims remaining in the application is in condition for immediate allowance. Accordingly, the examiner is requested to reconsider and withdraw the rejection and to pass the application to issue. The examiner is respectfully invited to telephone the undersigned at (336) 607-7318 to discuss any questions relating to the application.

Respectfully submitted,

Date: July 11, 2005

  
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